

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Adolfo Aviles-Hernandez, employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, having been duly sworn, do hereby depose and state as follows:

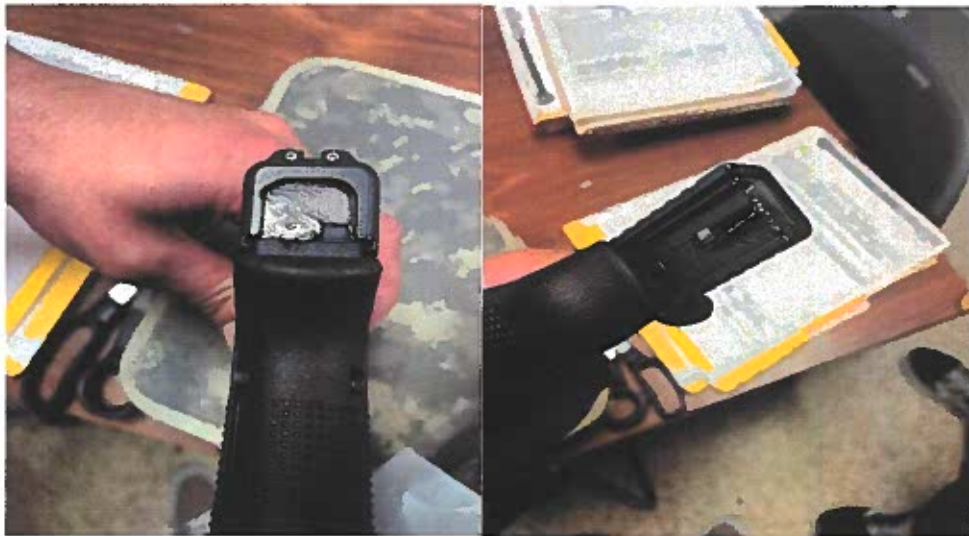
AGENT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosive (ATF) and have been so employed since September of 2023. I am a graduate of the Federal Law Enforcement Training Center and the ATF National Academy in Glynco, GA, where I received more than 1080 hours of training, including but not limited to firearms ID and handling, executing warrants, defensive tactics, interview techniques, surveillance techniques, undercover operations, investigation techniques, and others. I have a bachelor's degree in criminal justice from the Interamerican University of Puerto Rico.
2. In addition, I have had conversations and worked alongside other experienced local, state and federal law enforcement officers, as well as state and federal prosecuting attorneys concerning violations of firearms and narcotics laws.
3. Through training and investigations, I have taken part in cases relating to the trafficking of firearms, the use and possession of firearms by persons prohibited by law, and the possession of illegal firearms.
4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
5. I am familiar with the information contained in this Affidavit, either through personal investigation or through discussions with other law enforcement officers who obtained information through investigation and surveillance, which they in turn reported to me.

FACTS THAT ESTABLISH PROBABLE CAUSE

6. On February 6, 2025, Puerto Rico Police Bureau (PRPB) agents assigned to the Metro Narcotics Unit executed a state search warrant against a residence located at the Public Housing Project (PHP) Nemesio R. Canales Building 27 Apartment 519 in San Juan, Puerto Rico ("Apartment 519").
7. During the state search warrant execution, PRPB agents found Jonathan ALOMAR-REYES, an adult female and multiple minors inside Apartment 519. According to PRPB agents, the state search warrant document was showed to ALOMAR-REYES and the adult female in the residence. Shortly after being notified of the state search warrant ALOMAR-REYES stated that he had a firearm inside the cabinet that was in the kitchen.
8. PRPB agents searched and seized the following items inside the cabinet in the kitchen area:
 - a. One (1) Glock Pistol, Model 23, 40mm Caliber, Serial Number: TZB833
 - b. Three (3) pistol extended magazines
 - c. Sixty-Three (63) rounds of caliber 40mm ammunition
9. PRPB agents found the following items located in the living room area:
 - d. Three (3) cellphones
10. Furthermore, according to PRPB Agents, as part of the evidence seized in the search warrant there was One-thousand six hundred and sixteen dollars (1,616) in US Currency.
11. After the search warrant concluded, PRPB agents proceeded to transport ALOMAR-REYES and the adult female to the Metro Narcotics Unit located in Guaynabo, Puerto Rico.
12. On February 6, 2025, ATF Agents arrived at the PRPB Metro Narcotics Unit and interviewed ALOMAR-REYES. ALOMAR-REYES was read his Miranda Rights which he waived the right to have counsel present and agreed to speak to ATF agents.


13. According to ALOMAR-REYES, he was in the balcony of his dwelling when the police arrived and knocked the door.
14. ALOMAR-REYES mentioned that after he was notified of the search warrant by the police, he informed PRPB Agents that he had firearm inside the cabinet in the kitchen area. ALOMAR-REYES also stated to ATF agents he purchased the firearm for approximately \$900-\$1000 because he had received a death threat.
15. Furthermore, ALOMAR-REYES indicated he bought the firearm with a “chip” to make it “rapida” which roughly translates to full-automatic. Based on my training and experience a person who identifies that a firearm has a “chip” and or describes it as “rapida” is slang used to identify the firearm has been modified to shoot automatically. A dry field test preliminarily determined that the firearm is capable of firing more than one round with a single function of the trigger, making it a machinegun.



CONCLUSION

16. Based on the above facts, I have probable cause to believe that Jonathan ALOMAR-REYES has violated federal firearm laws. Specifically violated title 18 U.S.C. §§ 922(o) possession of a machinegun.

Respectfully submitted,


Adolfo Aviles-Hernandez
Special Agent
Bureau of Alcohol, Tobacco, Firearm
and Explosives

Sworn and subscribed in accordance with Fed. R. Crim. 4.1 by telephone at 11:00 a.m.,
this 7th day of February of 2025.

  Digitally signed by
Hon. Bruce J.
McGiverin
Hon. Bruce J. McGiverin
United States Magistrate Judge
District of Puerto Rico